Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

COMMENT:

TTS requests review of language in 73.315 to reflect the use of a 60dBu signal for Community of License contour requirements. This rule section currently requires a 70dBu contour over the principal community served by the Commercial FM station.

The FCC has long established the 60dBu (1.0mV/m) contour for NCE stations to cover the principal community , yet held to the 70dBu (3.16mV/m) for commercial signals. While there may have been some reasoning for this discrepancy in the past, clearly neither a radio listener or any 21st century FM receiver knows whether an incoming signal is commercial or non-commercial. With the vast majority of all FM reception being mobile in these days, and FM receiver technology being advanced, signal level for community service is no longer a serious consideration. Since the FCC has established that the 45dBu signal of a full power FM is "where they reasonably expect to have listeners" with respect to interference from FM translators (Section 74.1203(a)(3)(ii)); surely a level 15dB above that value should demonstrate proper coverage to a community of license. Standardizing the signal level for community of license coverage for all FM stations is a reasonable consideration to provide flexibility in site location for FM stations.

A thorough review of this technical restriction is hereby encouraged.

Respectfully Submitted

Jim Turvaville, Owner
Turbo Technical Services